

From: [Hauge, Paul M.](#)
To: [Yacovone, Krista](#)
Subject: RE: FOIA Request EPA-R2-2017-003521
Date: Monday, April 30, 2018 1:42:45 PM
Attachments: [ATT00001.txt](#)

Krista:

Following up on my e-mail below, with a slight correction – your March 2, 2017 e-mail seems to indicate that EPA withheld (as opposed to producing) 6,622 pages, i.e., that EPA produced 15,236 pages.

Thanks again.

Paul M. Hauge, Esq.

Counsel, Environmental Law Department

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(973) 596-4471

From: Hauge, Paul M.
Sent: Friday, April 27, 2018 3:04 PM
To: Yacovone, Krista
Subject: RE: FOIA Request EPA-R2-2017-003521

Krista:

Apologies for the delay, but I need some clarification as to a couple of aspects of your e-mail. As I understand it, the documents covered by our prior FOIA request (EPA-R2-2016-007137), including, by definition all documents over which G-I asserted a claim of confidentiality, all fell within the Bates range G-I_EPA0000001 to G-I_EPA0021858. We are still checking our records to confirm that we have received that entire range of pages, whether from EPA or from G-I. Do you have a record of which Bates pages EPA produced to us? An e-mail from you dated March 2, 2017 notes that of the 21,858 pages, EPA produced 6,622 pages (G-I_EPA0000369 to G-I_EPA0006751 and G-I_EPA0006779 to G-I_EPA0007017).

The second item in your e-mail (the July 22, 2016 letter, including Exhibits 1-2) evidently falls outside of the above-referenced Bates range. Therefore, it would not have been produced in response to the FOIA Request EPA-R2-2016-007137, either by EPA or by G-I. Has G-I asserted a new claim of confidentiality over this document, in connection with our more recent FOIA request (EPA-R2-2017-003521)? How many pages does it cover?

Thanks.

Paul M. Hauge, Esq.

Counsel, Environmental Law Department

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From: Yacovone, Krista [<mailto:yacovone.krista@epa.gov>]

Sent: Tuesday, April 17, 2018 3:41 PM

To: Hauge, Paul M.

Subject: FOIA Request EPA-R2-2017-003521

Paul,

This is to confirm our telephone conversation earlier today, during which you agreed to consult your client regarding withdrawal of a portion of your Freedom of Information Act (FOIA) Request No. EPA-R2-2017-003521 in light of the likelihood that you and/or your client already have the documents we discussed. If your client concurs, you would withdraw FOIA Request No. EPA-R2-2017-003521 as it relates only to the following communications from Andrew J. Rossman, Esq. of Quinn Emanuel Urquhart & Sullivan LLP on behalf of G-I Holdings Inc. to the U.S. Environmental Protection Agency: (1) the April 6, 2016 letter, including Addendums A & B as well as all enclosed documents bates numbered 00001-21858; and (2) the July 22, 2016 letter, including Exhibits 1-2.

Please let me know how to proceed.

Thank you,

Krista

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